

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**DECLARATION**

I, Valerie - Teo Liang Tuan, declare under penalty of perjury:

1. I am a Partner of Grant Thornton (Vietnam) Limited, headquarter located at 18th Floor, Hoa Binh International Office Building, 106 Hoang Quoc Viet Street, Nghia Do Ward, Cau Giay District, Hanoi.

Branch address: 561A, Dien Bien Phu Street, Ward 25, Binh Thanh, Ho Chi Minh City (the "Firm").

2. FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), have requested that the Firm provide the accounting, tax services, licensing services and declaration of Capital Gain Tax in Vietnam to the Debtors, and the Firm has consented to provide such services.

3. This Declaration is submitted in compliance with the *Order Authorizing Procedures to Retain, Compensate and Reimburse Professionals Utilized in the Ordinary Course*

---

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.



*of Business* (the “OCP Order”), which I have reviewed. I understand the limitations on compensation and reimbursement under such OCP Order.

4. The Firm HAS provided services to the Debtors prior to the Petition Date. The firm has provided the following services since August 2022: Tax compliance and accounting work.

5. The Debtors have requested, and the Firm has agreed, to provide services to the Debtors, and the Firm has consented to provide such services (the “Services”). The Services include, without limitation, tax services, licensing services and services regarding the declaration of Capital Gain Tax in Vietnam.

6. In the ordinary course of business, the Firm maintains a database for the purpose of performing conflicts checks. The Firm’s database contains information regarding present and past engagements. I obtained the attached list of key parties-in-interest from the Debtors for the purpose of searching the aforementioned database and determining the connection(s) which the Firm and/or its employees has/have with such parties. The Firm’s search of the database identified no connections.

7. To the best of my knowledge, formed after due inquiry, neither I, the Firm, nor any attorney or employee thereof (i) has any connection with the Debtors or (ii) currently represents (or previously represented) any of their creditors, other parties-in-interest, the U.S. Trustee or any person employed by the U.S. Trustee with respect to the Debtors or the matters upon which it is to be engaged. Additionally, the Firm, its attorneys and employees do not, by reason of any direct or indirect relationship to, connection with, or interest in the Debtors, hold or represent any interest adverse to the Debtors, their estates or any class of creditors or equity interest holders with respect to the matters upon which the Firm is to be employed, except as disclosed

A768  
ÔNG  
TINH  
T TH  
IẾT  
PH

above. The Firm does not hold or represent an interest adverse to the estate and is a “disinterested person,” as that term is defined in 11 U.S.C. § 101(14).

8. Neither I, nor any principal, partner, director, officer of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm.

9. The Firm’s current customary fixed fee, subject to change from time to time, is USD450 for monthly accounting and monthly/quarterly tax compliance and USD400 for Chief accountant service, Payment service and Statistics and Investment reports. In the normal course of business, the Firm does not revise its regular fixed fee.

10. The Debtors do not owe the Firm any outstanding services fee for prepetition services, the payment of which is subject to limitations contained in title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* To the extent that the Debtors have not already paid such amounts to the Firm, the Firm has agreed to waive any such unpaid amount for services rendered prior to the Petition Date.

11. The Firm does not keep time records in one-tenth of an hour increments in the ordinary course of business. Our staff who are involved in conducting the tasks related to the service provided would record the time they spent on the Company’s timesheet system. As noted above, services are charged based on a fixed fee.

12. The Firm received the following payments/transfers from the Debtors during the year period prior to the Petition Date: (list in spreadsheet/grid format: (i) invoice date, (ii) invoice amount, (iii) date(s) of service covered by invoice; (iv) payment date; and (v) payment amount.



Invoice date	Invoice amount	Date(s) of service covered by invoice	Payment date	Payment amount
15-09-2022	217,276,020	15-09-2022	05-09-2022	217,261,720
15-09-2022	40,024,530	15-09-2022	05-09-2022	40,010,230
12-10-2022	43,201,080	12-10-2022	11-10-2022	43,201,080
31-10-2022	78,375,600	31-10-2022	21-10-2022	78,375,600

13. As of the Petition Date, the Firm WAS NOT party to a services agreement with the Debtors.

14. The Firm understands that any compensation/reimbursement paid to the Firm is subject to disallowance and/or disgorgement under 11 U.S.C. § 328(c) and applicable law.

15. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 29<sup>th</sup> June, 2023



Valerie - Teo Liang Tuan